

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

Docket No. N2012-1

**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO APWU INTERROGATORY APWU/USPS-T2-1
REDIRECTED FROM WITNESS MASSE
(January 31, 2012)**

The United States Postal Service hereby provides its response to the above-listed interrogatory of the American Postal Workers Union, redirected from witness Stephen Masse. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing & Product Support

Nabeel R. Cheema

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-7178; Fax -5402
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TO APWU INTERROGATORY REDIRECTED FROM WITNESS MASSE

APWU/USPS-T2-1

On page 10 of your testimony you state “to ensure the Postal Service’s long-term survival, the expense line must urgently be reduced below the revenue line.” Given that the service changes presented in this docket were proposed in part because of their estimated cost savings, explain how the Postal Service’s proposed changes in service standards and network design complies with Section 101(a) of Title 39 which mandates that “[t]he costs of establishing and maintaining the Postal Service shall not be apportioned to impair the overall value of such service to the people” and describe the analysis that supports this explanation.

RESPONSE:

The changes being reviewed in this docket would lower the Postal Service’s costs but would not alter how those costs are apportioned. Accordingly, it is unclear what the nexus is between the quoted statutory language and the changes being reviewed in this docket.